

Site ID: 0714BD01

Mr. Paul V. Rossaco  
Project Coordinator  
Engineering Management Support, Inc.  
7220 West Jefferson Avenue, Suite 406  
Lakewood, Colorado 80235

Dear Mr. Rossaco:

The U.S. Environmental Protection Agency (EPA) has reviewed the document titled "Bridgeton Landfill Thermal Isolation Barrier Investigation Phase 1 Report, Bridgeton, St. Louis County, Missouri" prepared by Feezor Engineering, Inc. and P. J. Carey & Associates, in conjunction with Engineering Management Support, Inc. and Auxier and Associates, Inc. The cover letter on the document was dated December 19, 2014 and submitted to EPA in accordance with the Administrative Order on Consent, EPA Docket No. VII-93-F-0005, paragraph 51 to complete characterization of radiologically impacted material (RIM) at OU1, Area 1.

The EPA is providing comments for the reviewed document and also enclosing comments from the United States Army Corps of Engineers' technical review. Majority of the EPA comments enclosed were previously discussed at our joint technical meeting held on January 23, 2015 and agreed upon by the responsible parties in their response letter to the EPA, dated January 27, 2015; or further discussed during the February 18, 2015 teleconference.

All comments should be directly addressed through written correspondence to the EPA and can be also discussed by teleconference or email if needed to expedite response. Once approved, the EPA would like these comments incorporated in a revised work plan or if applicable comprehensive report containing data from the Phase I and II field work following the conclusion of the additional phase of fieldwork schedule for this year.

If you have questions, please contact me at (913) 551-7611.

Sincerely,

Brad Vann  
Remedial Project Manager  
Missouri/Kansas Remedial Branch  
Superfund Division

Encl:

cc: Shawn Muenks, MDNR  
Robyn Kiefer, USACE

## Comments:

1. All field notes and photos collected during fieldwork should be attached to the comprehensive report or added as appendices at completion.
2. The Data Quality Objectives in the pending revised work plan must differentiate the radiological contaminants from a radioactively impacted material (RIM) source versus a non-RIM/naturally occurring or other sources. Please revise the DQOs accordingly.
3. The upcoming investigation is dependent on the historical photographs to determine sampling locations. It is EPA understanding from our last teleconference that an aerial survey of the landfill was taken in 1973 and available, and was verbally requested during our last telephone conference on February 18, 2015. Therefore, please provide copies of this photograph and/or stereographic pairs, along with any other relevant or referenced historical information to EPA for supporting the rationale behind sample locations and or historical placement of RIM. This may be provided with the revised work plan or as a separate submittal to EPA.
4. The comprehensive final report must include a conclusion and recommendations section. In addition, document figures warrant revision that accurately depict and incorporate relevant site information both historical and based on recent sampling results around OU1, Area 1, as some of the historical RI boundaries are now obsolete.
5. Supplemental sampling needs to identify a clear process in the work plan, or reference an existing one, for decision making while in the field and relevant further investigation capabilities if concentrations of RIM are found in the pending expanded investigation locations without requiring another mobilization. The EPA anticipates RIM characterization at Area 1 to be complete with this pending round of fieldwork.
6. All work related documents (e.g., work plans, reports, deliverables, etc.) from this point forward must include a schedule of primary tasks/activities/milestones with along projected dates for their start/completion and where applicable identification of any critical path items.
7. It is EPA's intention to collect soil/split samples during the next round of fieldwork for submission of TCLP standard and/or pyrolysis analysis. Soils identified as containing RIM associated with the radionuclides historically dispose of at OU1 Area 1, need to be made available to EPA personnel or their field representatives. This would include and is not limited to existing RIM soils samples collected during the prior round of characterization that are currently maintained onsite.
8. Per the technical conference with EPA personnel on January 23, 2015, RPs need to perform additional sampling near elevated locations to determine whether or not contamination extends outside these areas. This includes establishing a no RIM boundary and performing additional sampling southward towards the North Quarry area and west of the original boundary of Area 1 to determine the extent of RIM in this area. The additional sampling needs to support the existing data, and in accordance with risk-based statistic, given the heterogeneity of how RIM was placed in the landfill.